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Hi friends and colleagues,

As you may already know, **today** is the comment deadline for the administration's review of national monuments designated using the Antiquities Act. This threatens almost thirty protected areas ranging from new monuments like Bears Ears and Gold Butte, to recently expanded marine monuments, and established monuments like Grand Staircase-Escalante. I wouldn't ordinarily reach out to so many of you, but the areas on the chopping block this time are near and dear to my heart.

Last fall, we saw how each of us share a commitment to working for better management of our public lands. The priorities that we identified in our recommendations--multiple use, sustained yield, cultural relationships, and public participation, outreach and communication--were codified in the monument proclamation for Bears Ears. Removing the monument designation or reducing directly compromises each of these attributes.

If you feel the same, or even if you've never experienced these areas and would someday like the chance, I urge you to submit a short and substantive comment in support of keeping Bears Ears National Monument the way it is. No matter your personal politics, our public lands connect us, and this move to rescind or reduce monuments is truly unprecedented.

I hope you'll join me in taking 5 minutes to make a comment today; you are welcome to use my language if that speeds the process. I also suggest uploading the .pdf of our recommendations to the comment form. If you need more information, here's a helpful

summary.

If you have questions or concerns, let me know. Would love to hear what others are working on!

Thanks,  
Claire

*Dear Secretary Zinke,*

*I'm writing today as an attendee of the 2016 Bureau of Land Management Student Congress and as a scientist, a descendent of 1880's Utah pioneers, and an avid outdoorswoman to urge you to keep Bears Ears National Monument protected.*

*As a participant at the 2016 Student Congress, I worked with 30 young leaders from across the country to develop recommendations for the Department of the Interior and Bureau of Land Management. Our group identified four main priorities: 1) Multiple use and sustained yield, 2) Cultural relationships (honoring past, present, and future), 3) Public participation, outreach, and education, 4) Human resources (job creation and retention for the next generation of public land managers).*

*The proposal to reduce or rescind Bears Ears National Monument directly contradicts the recommendations made by the next generation of public land managers to the Bureau of Land Management and Department of Interior at the 2016 Student Congress in the following ways:*

- 1) *According to the Federal Land Policy Management Act (FLPMA), agencies must manage for multiple use and sustained yield. We recommend strengthening programs for environmental restoration, agency and corporate accountability, and ecological health. Bears Ears NM provides additional support for land managers to prioritize these values.*
- 2) *To manage for cultural attributes, the BLM/DOI consulted tribal groups in collaborative management as support for the monument grew. The designation of the monument reflected the full 80 years of grassroots advocacy and tribal-led support that went into Bears Ears; to rescind or reduce the monument is both likely illegal and a step away from the tribally-integrated management structures that the next generation of land managers and users are asking for.*
- 3) *Public participation in former Secretary Jewell's listening tour demonstrated the incredible enthusiasm for protecting Bears Ears. Public education is something the DOI could improve, as significant misinformation regarding impacts of monument designation on traditional uses (wood gathering, hunting, etc) has become widespread. The public ought to know that the monument does not limit or restrict these uses, and the DOI must increase the emphasis on public outreach and education.*
- 4) *Removing or reducing national monument designation threatens jobs for the next generation of land managers. As baby boomers and "FLPMA babies" retire, DOI/BLM should prioritize job creation, recruitment, and retention for the next generation.*

*Since I've lived in the West all my life (northern Arizona, Washington, Oregon, and California), I've experienced the remarkable opportunities for hiking, climbing, hunting, and historical tourism offered in many of the national monuments that are being reconsidered. Bears Ears NM, Vermilion Cliffs NM, Grand Staircase-Escalante NM, and Gold Butte NM are all spectacular examples of native history, scenic value, and recreational potential. Each is also uniquely threatened by mining, cattle, or oil and gas operations that simply don't belong in landscapes that drive the region's economy with tourism alone.*

*Bears Ears clearly demonstrates a need for the enhanced protection and management of a national monument as laid out in the Antiquities Act.*

- The size of the monument—while smaller than the initial tribal proposal—is needed to protect historic and prehistoric sites and other items of scientific interest.*
- The designation allows current “available uses” of federal lands including wood gathering, hunting, and other traditional uses while also clarifying where mining is/is not appropriate given the exemplary historical and prehistorical artifacts, scenery, and regions of ecologic continuity.*
- Tribal, state, and local concerns clearly highlight the passion for protecting this place. As the designation process demonstrated, there was a vast majority of public support with a few vocal local detractors.*
- The monument designation allows crucial funding to be directed to the area.*
- As a monument, Bears Ears has tremendous potential to draw tourism to the area and provide a vital and stable source of economic rejuvenation that this rural area badly needs (and that short-term energy jobs have repeatedly failed to provide).*

*In the recommendations of the student congress, we found it necessary to formally recognize “our ongoing commitment to the continuation of the multiple use and sustained yield of federally managed public lands. It bears reiteration that ongoing federal management of the national public lands system is in the public’s best interest; public lands must remain in public hands. Our management recommendations center in the following themes: a shift in values (from extractive to sustainable), the inclusion of diverse cultures that includes robust public participation and comprehensive history, and the development of a cohesive public land narrative.”*

*I urge Secretary Zinke to consider these recommendations and to honor his previous commitments to tribal sovereignty by keeping Bears Ears National Monument as it is.*

*Sincerely,*

*Claire Martini*

*Flagstaff, Arizona (86004)*

**Recommendations for the Bureau of Land Management**  
**Third Biennial Student Congress**  
**September 2016**  
**Las Cruces, New Mexico**

**I. PREAMBLE**

As we reflect on the 40<sup>th</sup> anniversary of the Federal Land Policy and Management Act (FLPMA), the Third Biennial Student Congress on Public Lands convened to discuss a national land ethic as it relates to FLPMA and the current management processes of our national public land system. The Student Congress asks that current and future national public lands administration, as well as congressional leadership, consider using FLPMA legislation as a framework for a national land ethic that benefits all users of public lands.

The unique environmental and social challenges of our time call for a shift in culture, both within the agencies and for the public they serve. The development of a land ethic is essential to this just and sustainable transition. Aldo Leopold stated that "...a land ethic reflects the existence of an ecological conscience which in turn reflects a conviction of individual responsibility for the health of the land." The Student Congress is of the opinion that leading the development of a unified ecological conscience is a fundamental responsibility of agency, departmental, and congressional leaders. These leaders should recognize the need to possess a personal conviction of responsibility, and should cooperatively develop legislation, in addition to agency policies, that protect our public lands, including their natural, cultural, and historical resources that allow the American people to enjoy positive economic outputs and recreational benefits.

The Bureau of Land Management (BLM) should be ready to accept the challenge as lead agency in creating a cultural shift to a unified ecological conscience that constitutes a national land ethic. Given the wide-ranging style of resource management that the agency possesses, the BLM is well-qualified to utilize FLPMA as a framework for the ethic.

Building upon the work of the 2<sup>nd</sup> Student Congress, which recognized that changing social, cultural, and environmental conditions drive an ever-changing ecological ethic, we suggest that the agency consider resolutions within the following topics:

- Multiple Use/Sustained Yield
- Cultural Relationships: Honoring Our Past, Present, and Future
- Public Participation, Outreach, and Education
- Human Resources

Specific recommendations are outlined in the resolutions below to reflect the overall goal of developing an inclusive national land ethic.

## II. RECOMMENDATIONS

### A. Multiple Use and Sustained Yield

#### 1. Restoration

For our purposes, “restoration” is defined as the improvement of areas to a healthy ecological state, in order to support multiple use and sustained yield.

We recommend the development of a lessee-funded land restoration plan. In such a plan, public land lessees would be required in their bid package to provide the necessary funds to restore an area of equal or greater size to the area being impacted. In addition, restoration management actions should be increased giving priority to areas of critical environmental concern (ACEC); riparian and wetland areas; and productive landscapes that are in initial states of decline (as opposed to highly degraded landscapes that would require more resources to restore).

#### 2. Accountability

Accountability in this context refers to ensuring that all parties are responsible for their actions related to avoiding ecological consequences and permanent impairment of the land. This extends to lessees of the land, contractors, other public land users, and federal agencies that manage the land. We recommend higher accountability of the BLM managers, officers, and senior employees in relation to enforcement of land use regulation. We recommend the BLM oversees direct, active, and effective cleanup following the activity of extractive industries by the lessee, as well as adherence to grazing lease adjustments.

#### 3. Ecological Health

We recommend that the BLM interpret FLPMA according to an ecological paradigm as opposed to an extractive paradigm to better manage for future generations’ interests in the public lands. We recommend that social and natural resource inventories be completed consistently, and fit into the adaptive management framework. To ensure that resources are being managed in the most sustainable fashion for current and future generations, models utilized for inventories should use the most recent models available for climate, population, and demography. We encourage the BLM to incorporate the use of ecosystem service concepts as defined in the Millennium Ecosystem Assessment (MA). Ecosystem Services, or the benefits gained by humans from ecosystems, are grouped into four broad categories:

- Provisioning (e.g., production of food and water)
- Regulating (e.g., control of climate and disease)
- Supporting (e.g., nutrient cycles and crop pollination)
- Cultural (e.g., spiritual and recreational)

#### 4. Policy Review

The BLM should ensure that today’s laws and policies are compatible with one another, and that they perpetuate a continued shift into a more ecological emphasis. We recommend a revision of laws that restrain the BLM’s ecological-minded actions (e.g., Mining Law of 1872), along with

following through with the language and policy of FLPMA utilizing an ecological paradigm as opposed to an extractive paradigm.

## **B. Cultural Relationships: Honoring the Past, Present, and Future**

The student congress urges the development and implementation of a national land ethic for stewardship of our multicultural American heritage. While managing for ecological resilience, our public lands ought to facilitate a broader cultural consciousness of public lands' history and use. The first steps to building diverse communities are to orient management processes, decisions, and interpretation around honoring the full story of our nation's public lands.

### **1. Elevation of tribal groups in collaborative management and cultural consultation**

Tribes hold a unique position in American land stewardship. In light of the long and complex history of dispossession and broken promises, we recommend the following work to redress sovereignty and promote a sense of cultural ownership and healing through planning and management practices.

- The Department of Interior should provide avenues for tribal management of ancestral lands and interests.
- Prioritize tribally-led collaborative management of historic areas, water resources, grave sites, areas used for plant-gathering, story sites, and other culturally important locations where Indigenous management is an important step to address disenfranchisement on public lands.
- Tell the rich and complicated story of our nation via interpretation of public lands (e.g., signage, historical assessments and communication, etc.).

### **2. Recognition and inclusion of Multicultural Relationships in BLM planning and management.**

As Aldo Leopold discussed “ecological conscience”, we call for “cultural conscience” as a basis for the BLM’s management of public lands and their users. Public lands are central to the livelihoods and values of living communities. Alongside the BLM’s mandate for ecological preservation and conservation, we need to understand, balance, and conserve these cultural values.

- Because cultural resources are increasingly jeopardized by development, overuse, lack of visitor education or inadequate law enforcement, we encourage the BLM to direct resources towards management and protection of cultural resources (e.g., archeological artifacts, sacred sites, ancestral homelands, historic use, grave sites, and other areas or objects as directed by cultural leaders).
- The BLM should prioritize understanding and incorporation of the perspectives of historically underrepresented groups, including but not limited to African-Americans, Indigenous peoples, Latinos, working classes, women, and immigrants.
- The BLM should recognize the complex and often unequal socio-economic systems interlaced with resource use on the public lands. While the value of economic activity on the public lands is inescapable, the BLM should critically examine its role in constructing and perpetuating this inequality in public lands communities. The BLM should work

toward environmental justice and economic empowerment in public lands communities to ensure future cultural and economic sustainability.

- To implement cultural competency and diversity in BLM management plans, the BLM should advance cultural knowledge of its lands through programs in the arts and humanities, and social science research on western communities.

### **3. Consensus building**

Understanding the culture of the BLM, and of the stakeholder groups we work with is critically important to the achievement of the aforementioned resolutions. This understanding of the organization's role can assist the agency in fostering conversation (collaborative management) among various user groups, in an effort to build consensus in managing for cultural relationships.

- Whereas the understanding of the BLM's history is important to build consensus, this Student Congress recommends that the agency utilize the experiences of former and current BLM employees, as well as Public Lands Foundation (PLF) members, to develop oral histories and institutional narratives in support of this goal. These narratives can be critical in helping redefine perceptions of the agency that can be barriers to consensus building.

## **C. Public Participation, Outreach and Education**

In the spirit of FLPMA, the Student Congress calls the BLM to develop a robust, proactive, and regionally focused education and outreach campaign. This campaign should reflect the “cultural conscience” concept outlined in Section B, as well as prioritize those who lack meaningful access to the planning process and have a strong interest in public lands. The campaign must seek to include historically, socially, or culturally disenfranchised communities.

We stress the importance of connecting landscapes and people to these landscapes. Thus, an outreach campaign should highlight consumptive and nonconsumptive use to mirror shifting values and the increasing diversity of public land users. With direction from the Department of Interior, we call each state office to implement a campaign that incorporates the following recommendations:

### **1. Outreach & Education**

We define “the public” as people and persons who have a direct or indirect interest in public lands and/or are impacted by management actions.

Scarce funding and resources is an ongoing challenge. Therefore, the BLM should consider collaboration with nonprofit organizations to implement and expand on our recommendations. Additionally, previous participants of the Student Congress are already ambassadors for public lands and we encourage the BLM to utilize these individuals for implementation and guidance.

The story of our public lands illustrates America's complex and rich culture, history, and future. The BLM should produce outreach materials that acknowledge the complete history of our public lands, including both success stories and mistakes that provide important learning opportunities. The BLM and partners should weave narratives that reflect and respect diverse

values as expressed by the public, the role of FLPMA, and the importance of retaining public lands.

To help tell this story, the BLM should utilize technology and outreach methods appropriate for each community with a particular emphasis on NEPA and public participation. We concur with the first Student Congress' recommendations to utilize both traditional media and emerging media. These include open forums, public focus groups, blogs, fact sheets, frequently updated photos and video, interpretation and citizen science apps, mobile friendly websites, field guides, and frequent surveys and polls. The BLM can partner with outside organizations for many of these activities. Internally, the BLM should maintain updated and responsive social media accounts and websites.

We recognize that not all communities have the same access to technologies. To address this, we call the BLM to maintain tools for offline outreach, targeting underrepresented people, stakeholders, and communities. For example, proposed projects and actions can be highlighted in local newspapers.

## **2. Youth Involvement**

Youth are the next generation of public land users and managers and the BLM should expand its youth outreach programs. As asserted by the 2012 amendment to FLPMA, we encourage interagency collaboration and partnerships with outside groups.

## **3. Volunteer Programs**

We also ask the BLM to expand volunteer programs. These programs can reaffirm feelings of holistic public land ownership. As appropriate, the BLM should establish partnerships with outside groups and other land management agencies to facilitate these programs.

## **4. NEPA**

Opposition to federal land management is a symptom of accessibility to the land management planning process. Although the NEPA process is critical for responsible land management, it's often perceived as bureaucratic, incomprehensible, and inaccessible to members of the public. Therefore, we call for the BLM to further improve the national register for Land Use Planning and National Environmental Policy Act. Specific recommendations include:

- Including an explanation of NEPA, key terms, and instructions on the main database website.
- Developing a corresponding website for each project that provides clear information including maps, scoping documents, project contact information, and other documentation. Accessibility and consistency should be a primary goal. We encourage the BLM to look at the Forest Service's individual NEPA project websites as an example.
- Maintaining the database to function as a solicitation for public participation and showcase multiple use.

Finally, to guide ongoing public outreach and education activities, we recommend an agency rule describing best practices for public engagement.

## **D. Human Resources**

Aside from the many external challenges that the BLM faces in managing public lands for multiple use and sustained yield, the internal institutions that have been developed in response to many competing interests and reinforced by a restrictive HR program serve to pose a considerable internal challenge. In order to shift these institutions towards a state more amenable to the external changes presented in these recommendation we propose modest adjustments to the agency's human resource systems. We believe these adjustments will allow the agency to intentionally direct the people that are necessary to reify agency wide cultural shifts and institutional change. First, our human resource recommendations aim to increase employee retention, serving to protect the considerable institutional knowledge possessed by BLM staff. Generally, we propose to do this by improving recruitment strategies and systems, broadening the direct hire program, and better integrating the career ladder systems within single job descriptions. Second, our human resource recommendations aim to better facilitate community involvement and strengthening cultural relationships by creating internal training programs and community liaisons.

### **1. Improved Recruitment Strategies**

Government agencies are faced with an impending staffing crisis as the old guard begins to transition to retirement. Taken with the goal of shifting institutional practices, we see a need to recruit young experts that can bring fresh perspectives to the agency. As it stands, the hiring system favors career federal employees which may or may not be best suited to the BLM's needs and reimagined vision. We recommend outreach programs that seek out a more diverse pool of young experts as well as streamlining the processes to employ them. We recommend the agency launch a website where jobs can be posted before posting to the USA jobs site. This would:

- Allow a new generation of government employees to begin conversations with agency hiring authorities prior to application.
- Provide candidates additional time to prepare application materials prior to formally applying through USA jobs.
- Allow community partners more time to tap their own networks and potentially reach people that may otherwise not have applied.

Improving recruitment strategies, in conjunction with a broadening of direct hire programs, can help to place the right people in the right positions for agency benefit.

### **2. Direct Hire Authority**

The Direct Hire Authority – Resource Assistant Internships are an effective way to meet the internal HR challenges that exist within the BLM. We recommend that the BLM more explicitly promote the program across all field, district, and state offices to increase the awareness of managers and supervisors to the program and its benefits. Furthermore, we recommend that the BLM move past the concept of solely offering these internships during summer months. Many students or recent graduates have the capability and flexibility to complete internships throughout the year, and therefore, the BLM should be flexible in the timing of available internships. This flexibility, coupled with a reinvigorated focus on succession planning, will

ensure the retention of institutional knowledge while providing the agency progressive continuity.

### **3. Career Ladders**

In order to better retain institutional knowledge held by existing career employees, we also recommend increased emphasis on integrated vertical career ladders. As it stands, employees often have to switch jobs in order to be promoted, then try to return to their original job at the promoted pay grade level. This wastes time and resources, limits potential for employee retention, and decreases employee morale. Bridging career ladders within single jobs will allow employees to be promoted while retaining their institutional knowledge and not spending relocation and training resources.

### **4. Internal Training Programs**

BLM employees act as ambassadors for public lands and play key roles as members of local communities. To further foster community relationships and encourage collaborative decision-making, we recommend that the BLM provide internal training programs that help employees build community outreach, moderating, and conflict resolution skills. These programs should also incorporate cultural knowledge appropriate to each region and community.

### **5. Community Liaison**

Strengthening cultural relationships and enhancing public outreach and participation are very large and important recommendations that we believe will take a lot of attention and dedication. In order to better facilitate these tasks, in addition to an internal training program, we recommend that the BLM designate community liaisons in each district. Giving the districts the freedom to decide how to implement these liaisons (e.g., creating new positions dedicated solely to the task or designating current employees to take on the responsibility). These community liaisons will be tasked with:

- Overseeing the education and outreach campaign (outlined in Section C) in their region.
- Ensuring and enhancing the recognition and inclusion of the public and the diverse cultures represented in their region.
- Further expanding cultural relationships and enhancing collaborative management (outlined in Section B) in their region.

## **III. CONCLUSION**

In conclusion, we the members of the 3rd Biennial Student Congress on Public Lands formally recognize our ongoing commitment to the continuation of the multiple use and sustained yield of federally managed public lands. It bears reiteration that ongoing federal management of the national public lands system is in the public's best interest; public lands must remain in public hands. Our management recommendations center in the following themes: a shift in values (from extractive to sustainable), the inclusion of diverse cultures that includes robust public participation and comprehensive history, and the development of a cohesive public land narrative. We believe that the execution of these recommendations will lead to the realization of an inclusive national land ethic and the achievement of the BLM's overall vision.

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